

## **Exhibit A**



Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants Google LLC (“Google”) and YouTube, LLC (“YouTube”) (collectively, “Defendants”) hereby object and respond to Plaintiffs’ Notice and Request for Production of Documents, Set 2 (“Requests”), as follows:

**PRELIMINARY STATEMENT**

Defendants’ responses reflect only the current state of Defendants’ knowledge and information gained through their reasonable investigation in this action regarding the documents and information Plaintiffs have requested. Defendants’ investigation and discovery in this action are continuing, and Defendants are continuing to evaluate what information may exist, how far back it is kept, and what burden may be associated with identifying and producing information, even if it exists. Defendants may learn of additional documents and information pertaining to the Requests. Defendants expressly reserve the right to revise or supplement their responses to the Requests without assuming any additional obligation to do so.

A response to a Request shall not be deemed a waiver of any applicable objection, including privilege, immunity, or protection, or an admission of relevancy. Defendants make any response on the condition that the inadvertent production and/or disclosure of privileged or otherwise protected information does not waive any of Defendants’ rights to protect such information, all of which are expressly reserved, and that Defendant may withdraw any such information inadvertently produced and/or disclosed as soon as identified. *See* Dkt. No. 248. By producing or agreeing to produce documents or information in response to any Request, Defendants do not concede that any aspect of Plaintiffs’ claims related to those topics are permissible under Section 230, the First Amendment to the United States Constitution and corresponding provisions of applicable State constitutions, or are otherwise relevant to this litigation. Defendants reserve the right to challenge the authenticity, admissibility, or use of any document produced, or information provided, in response to the Requests including without limitation in any hearing, proceeding, trial, or otherwise.

Any failure of Defendants to make a specific objection to any specific Request is not an admission that documents or information responsive to that Request exist. Likewise, any statement in this response that Defendants will produce documents or information in response to a specific

Request does not mean that Defendants in fact have any such documents, or that any such documents exist, or that Defendants will search all files maintained by any person or any source. In light of the breadth of the Requests and the ongoing nature of investigation and discovery, Defendants will produce non-privileged, non-protected documents and log privileged or work-product documents responsive to the Requests, if any, and as described herein (1) subject to any and all objections noted below; (2) on a rolling basis; and (3) subject to the provisions of (a) the ESI Protocol entered in the above-titled action (*see* Dkt. No. 690), (b) the privilege log protocol entered in the above-titled action (*see* Dkt. No. 740), (c) the MDL Protective Order (*see* Dkt. No. 586), and (d) the 502(d) Order (*see* Dkt. No. 248). This includes, but is not limited to, production from an agreed-upon list of custodians as well as other reasonable methods and parameters.

# **OBJECTIONS TO INSTRUCTIONS, RULES OF CONSTRUCTION, AND**

## **DEFINITIONS**

The following Objections apply to and are incorporated by reference into each and every response to the separately-numbered Requests as if set forth in full therein. From time to time a specific response may repeat one of these Objections for emphasis or for some other reason. The failure to repeat any of these Objections in any specific response shall not be interpreted as a waiver of any Objection to that response.

1. Defendants object to the Definitions, Rules of Construction, Instructions, and Requests to the extent they seek to impose on Defendants obligations over and above those contained in the applicable law, including, but not limited to, Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Northern District of California, the Standing Order for Discovery in Civil Cases before Judge Kang, or any other applicable rule, order, or law.

2. Defendants object to each of the Definitions, Rules of Construction, and Instructions to the extent that they call for the production of “all” documents or information described. Unless otherwise stated, Defendants will construe each Request to require Defendants to use only reasonable diligence to locate responsive documents or information subject to the provisions of the ESI Protocol entered into by the Parties in this matter (*see* Dkt. No. 690) and the Protective Order (*see* Dkt. No. 586) through a search of the documents of an agreed-upon and Court-ordered list of

1 custodians using the negotiated search terms over the applicable Relevant Time Period, and, if  
2 appropriate, non-custodial sources from which the collection and search for potentially relevant  
3 information is proportional to the needs of this case. Defendants object to the Requests to the extent  
4 that they purport to require Defendants to conduct anything other than a reasonable and diligent  
5 search for reasonably accessible files, including electronically-stored information, from accessible  
6 sources where responsive documents reasonably would be expected to be found. Any specific  
7 Request that seeks to require Defendants to exceed such a search is overly broad and unduly  
8 burdensome.

9         3. Defendants object to the definition of “Communication” to the extent it exceeds the  
10 scope contemplated by the Federal Rules of Civil Procedure, the Local Rules of the United States  
11 District Court for the Northern District of California, or other applicable law. Defendants further  
12 object to the definition as overly broad and unduly burdensome to the extent it encompasses  
13 information not relevant to the parties’ claims or defenses and would require Defendants to collect,  
14 review and/or produce information that is disproportionate to the needs of this case.

15         4. Defendants object to the definition of “Document” to the extent it exceeds the scope  
16 contemplated by the Federal Rules of Civil Procedure, the Local Rules of the United States District  
17 Court for the Northern District of California, or other applicable law. Defendants further object to  
18 the definition as overly broad and unduly burdensome to the extent it encompasses information not  
19 relevant to the parties’ claims or defenses and would require Defendants to collect, review, and/or  
20 produce information that is disproportionate to the needs of this case.

21         5. Defendants object to the definition of “Electronically Stored Information” or “ESI”  
22 to the extent it exceeds the scope contemplated by the Federal Rules of Civil Procedure, the Local  
23 Rules of the United States District Court for the Northern District of California, or other applicable  
24 law. Defendants further object to the definition as overly broad and unduly burdensome to the extent  
25 it encompasses information not relevant to the parties’ claims or defenses and would require  
26 Defendants to collect, review, and/or produce information that is disproportionate to the needs of  
27 this case.  
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6. Defendants object to Plaintiffs’ definition of the term “Identity” as overbroad, unduly burdensome, seeking the production of information that is not relevant to the claim or defense of any party, not proportional to the needs of the case, and to the extent the information sought is not reasonably accessible to Defendants upon reasonable diligence. Defendants further object that the term “Identity,” as defined, seeks information that invades the right of privacy in violation of Article I, Section 1 of the California Constitution.

7. Defendants object to Plaintiffs’ definition of the term “Including” as overbroad, unduly burdensome, seeking the production of information that is not relevant to the claim or defense of any party, not proportional to the needs of the case, and to the extent the information sought is not reasonably accessible to Defendants upon reasonable diligence. In particular, the definition of “Including” fails to reasonably define the scope of information sought and seeks information that is duplicative, not relevant to the subject matter of this litigation, and not likely to lead to the discovery of admissible evidence. Defendants further object on the ground that the definition of “Including” calls for information protected by the attorney-client privilege, the work product doctrine, and potentially other applicable privileges or protections.

8. Defendants object to Plaintiffs’ definition of the term “Named Features” as seeking the production of information that is not relevant to the claims or defenses of any party and not proportional to the needs of the case to the extent the information sought includes documents or information pertaining to allegations that this Court held were barred by Section 230 and/or the First Amendment in its November 14, 2023 Order (Doc. 430) at 16-19, 22 because such allegations directly target Defendants’ roles as publishers of third-party content, including:

- Failing to put “[d]efault protective limits to the length and frequency of sessions”(MAC ¶ 845(e));
- Failing to institute “[b]locks to use during certain times of day (such as during school hours or late at night”(id. at ¶ 845(h));
- Not providing a beginning and end to a user’s “Feed” (id. at ¶ 845(i));
- Publishing geolocating information for minors (id. at ¶ 845(t));
- Recommending minor accounts to adult strangers (id. at ¶ 845(u));
- Limiting content to short-form and ephemeral content, and allowing private content (id. at ¶ 864(l));
- Timing and clustering of notifications of third-party content in a way that promotes addiction (id. at ¶ 845(l));
- Use of algorithms to promote addictive engagement (id. at ¶ 845(j)); and
- Timing and clustering of notifications of Defendants’ content to increase addictive use (id. at ¶ 845(l)).

1  
2           9. Defendants object to Plaintiffs’ definition of the terms “Policy” or “Policies” as  
3 vague, ambiguous, indefinite, overbroad, unduly burdensome, seeking the production of  
4 information that is not relevant to the claim or defense of any party, not proportional to the needs of  
5 the case, and to the extent the information sought is not reasonably accessible to Defendants upon  
6 reasonable diligence. In particular, the terms “Policy” and “Policies” are vague, ambiguous, and  
7 overbroad in their use of the undefined terms “formal and informal,” “systems,” “customs,”  
8 “methods and means of implementation” and “responsible for their management and  
9 implementation”, and in their requirement that Defendants “Identify” the “Persons responsible for  
10 the management of their implementation.”

11           10. Defendants object to Plaintiffs’ definition of the terms “Relating to,” “relate to,”  
12 “referring to,” “refer to,” “reflecting,” “reflect,” “concerning,” and “concern” as vague, ambiguous,  
13 indefinite, overbroad, unduly burdensome, seeking the production of information that is not relevant  
14 to the claim or defense of any party, not proportional to the needs of the case, and to the extent the  
15 information sought is not reasonably accessible to Defendants upon reasonable diligence. In  
16 particular, the definition of these terms fails to reasonably define the scope of information sought  
17 and seeks information that is duplicative, not relevant to the subject matter of this litigation, and not  
18 likely to lead to the discovery of admissible evidence. Defendants further object on the ground that  
19 the definition calls for information protected by the attorney-client privilege, the work product  
20 doctrine, and potentially other applicable privileges or protections.

21           11. For purposes of responding to these Requests, “Relevant Geographic Area” means  
22 the United States of America, the European Union, the United Kingdom, and Australia. *See* Dkt.  
23 No. 953.

24           12. Defendants object to Plaintiffs’ definition of the term “Relevant Time Period” as  
25 vague, ambiguous, indefinite, overbroad, unduly burdensome, not proportional to the needs of the  
26 case, and inconsistent with the Court’s June 20, 2024, Order on the relevant time period applicable  
27 to Defendants (*see* Dkt. No. 953). Further, that the definition is overbroad, unduly burdensome and  
28 disproportional because it includes, *inter alia*, time periods for which claims would be barred under

1 the relevant statute of limitations, and time periods before and after the relevant underlying events.  
2 Defendant also objects to Plaintiffs' proposed Relevant Time Period as unduly burdensome given  
3 the huge quantities of data and documents that already would need to be collected, stored and  
4 searched even for a shorter time period. For purposes of Defendants' responses to the Requests and  
5 unless stated otherwise, "Relevant Time Period" means the period beginning January 1, 2015, and  
6 ending on April 1, 2024, with two exceptions. For document discovery regarding YouTube's  
7 recommendation system, including Watch Time, Relevant Time Period means the period beginning  
8 January 1, 2011, and ending on April 1, 2024. For document discovery regarding YouTube Kids,  
9 Relevant Time Period means the period beginning January 1, 2014, and ending on April 1, 2024.

10 13. Defendants object to Plaintiffs' definition of the term "Safety" as vague, ambiguous,  
11 indefinite, overbroad, unduly burdensome, seeking the production of information that is not relevant  
12 to the claim or defense of any party, not proportional to the needs of the case, and to the extent the  
13 information sought is not reasonably accessible to Defendants upon reasonable diligence. In  
14 particular, the term "Safety" is vague, ambiguous, and overbroad in its use of the undefined terms  
15 "wellbeing," "safety" and "protection from risks." Defendants further object to the definition to the  
16 extent that it includes "protection from risks of extortion, sextortion, trafficking, bullying,  
17 harassment, CSAM victimization or revictimization, and predation," which arises from and is  
18 dependent on third-party content and/or bad actors.

19 14. Defendants object to Plaintiffs' definition of the term "User Data" as vague,  
20 ambiguous, indefinite, overbroad, unduly burdensome, seeking the production of information that  
21 is not relevant to the claim or defense of any party, not proportional to the needs of the case, and to  
22 the extent the information sought is not reasonably accessible to Defendants upon reasonable  
23 diligence. In particular, the term "User Data" is vague, ambiguous, and overbroad in its use of the  
24 undefined terms "all information concerning the user of an account," "any data you collect," and  
25 "data related to the identity, behavior, activity, or characteristics of users."

26 15. Defendants object to Plaintiffs' definition of the terms "You," "Your," "Defendant,"  
27 and "Defendants" on the grounds that the definition is overbroad, vague and ambiguous, and unduly  
28 burdensome. Defendants further object to the definition to the extent it seeks information not



1 currently in the possession, custody, or control of Defendants. Defendants will respond solely on  
2 behalf of themselves (Google LLC and YouTube, LLC), and not any other subsidiaries or affiliates,  
3 or any other person or entity. Defendants further object to the definition on the grounds that it  
4 includes Defendants' attorneys and requires Defendants to provide a legal conclusion or to produce  
5 information that is protected by any privilege, including the attorney-client privilege, work product  
6 immunity doctrine, common interest privilege, or any other applicable privilege, immunity, or  
7 restriction on discovery. For purposes of responding to the Requests, "You," "Your," "Defendant,"  
8 and "Defendants" will be defined as Google LLC, YouTube, LLC, and those authorized agents and  
9 employees acting on its behalf and within the scope of their agency or employment.

10 16. Defendants object to Plaintiffs' definition of the term "Youth" as overbroad, unduly  
11 burdensome, seeking the production of information that is not relevant to the claim or defense of  
12 any party, and not proportional to the needs of the case to the extent the definition includes users  
13 who are 18 years old and older. For purposes of Defendants' responses to the Requests and unless  
14 stated otherwise, "Youth" means users who are under the age of 18.

15 17. Defendants object to Plaintiffs' definition of the term "YouTube Platform" because  
16 it is directed to the YouTube platform as a whole, rather than the specific features that the Court has  
17 concluded can provide the basis for a viable cause of action in this matter, and to the extent the  
18 information sought is not reasonably accessible to Defendants upon reasonable diligence.  
19 Defendants further object that the term "YouTube Platform" is vague, ambiguous, and overbroad in  
20 its use of the undefined terms "developed, tested, or made available for use," and "all features or  
21 surfaces accessible to some or all users of the platform."

22 18. Unless otherwise stated, Defendants will not withhold otherwise responsive and  
23 non-privileged draft versions of documents to the extent that Defendants collect and retain such  
24 drafts in the ordinary course of business and are able to locate such documents pursuant to a  
25 reasonable search, and to the extent the collection and production of this data is reasonable and  
26 proportional to the needs of this case. Defendants will only search for and collect draft versions of  
27 documents to the extent that those drafts are saved as separate documents and are collected and  
28 identified pursuant to the parties' agreement on date range, search terms, and custodians.

Defendants will not conduct a search for historic versions of a document created in Google Workspace. Defendants' discovery tools do not allow them to automatically collect each version of Google Workspace documents and so their collection would be unduly burdensome and not proportionate. *See* Fed. R. Civ. P. 26(a)(2)(B) ("A party need not provide discovery of electronically stored information from sources that the party identifies as not reasonably accessible because of undue burden or cost."). Defendants will not search for or produce, and thus will withhold, these historic "versions" of responsive documents on the basis of this objection.

The following responses to the Requests are provided subject to the foregoing Preliminary Statement and Objections, which are incorporated into each response.

### **OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION**

#### **DOCUMENT REQUEST NO. 9:**

Documents that constitute, identify, or describe any Policies, models, tools, mechanisms, or other means used by You to estimate or infer the age of users ("Age-Estimation Tools") on Your Platform during the Relevant Time Period.

#### **RESPONSE TO DOCUMENT REQUEST NO. 9:**

Defendants object to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case because, as drafted, the request is not tailored to Plaintiffs' remaining allegations and the way the YouTube Platform allegedly contributes to the alleged harm. Defendants object to this Request as vague and ambiguous in its use of the terms "estimate or infer" and "models"; these vague terms make it unclear what the Request seeks information regarding. Defendants object to this Request to the extent it seeks information protected from disclosure by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege or protection and will withhold or redact as appropriate such information to the extent it exists. Defendants object to this Request to the extent that it seeks materials relating to users located outside of the United States and/or features not available in the United States. Defendants object to this Request as unduly burdensome and not proportional to the needs of the case because the Request is not limited as to time.

Defendants object to this Request to the extent it seeks information protected from disclosure by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege or protection and will withhold or redact as appropriate such information to the extent it exists. Defendants object to this Request to the extent that it seeks materials relating to users located outside of the United States and/or features not available in the United States. Defendants object to this Request as unduly burdensome and not proportional to the needs of the case because the Request is not limited as to time.

Subject to and without waiving any of the foregoing objections, Defendants will conduct a reasonable search for documents sufficient to explain how [REDACTED] in the United States in the ordinary course of business during the Relevant Time Period, and will produce non-privileged responsive documents.

**AMENDED RESPONSE TO DOCUMENT REQUEST NO. 15:**

Defendants amend and supplement their response as follows:

Subject to and without waiving any of the foregoing objections, Defendants will conduct a reasonable search for documents sufficient to show a representative sample of final versions of their operative contracts with third-party vendors, if any, that YouTube uses [REDACTED] in the United States in the ordinary course of business during the Relevant Time Period, and will produce non-privileged responsive documents.

**DOCUMENT REQUEST NO. 16:**

Documents sufficient to show all features, classifiers, data sets, dimensions, and/or demographics that You use to categorize users of, or accounts on, Your Platform.

**RESPONSE TO DOCUMENT REQUEST NO. 16:**

Defendants object to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it seeks documents or other materials related to features for which the Court has held claims are barred by the First Amendment or Section 230 and because, as drafted, the Requests seeks information regarding “all features, classifiers, data sets, dimensions, and/or demographics,” and is not tailored to Plaintiffs’ remaining allegations and the way the YouTube Platform allegedly contributes to the alleged harm. Defendants further object

1 to this Request as overbroad, not proportional to the needs of the case, and not relevant to any  
2 viable claim or defense in that it seeks discovery concerning non-minor and non-adolescent  
3 platform users. Defendants object to this Request as vague and ambiguous in its use of the terms  
4 “data sets,” “dimensions,” and “categorize”; these vague terms make it unclear what behavior it is  
5 that the request seeks information regarding.

6 Defendants object to this Request to the extent it seeks information protected from  
7 disclosure by the attorney-client privilege, work-product doctrine, and/or any other applicable  
8 privilege or protection and will withhold or redact as appropriate such information to the extent it  
9 exists. Defendants object to this Request to the extent that it seeks materials relating to users  
10 located outside of the United States and/or features not available in the United States. Defendants  
11 object to this Request as unduly burdensome and not proportional to the needs of the case because  
12 the Request is not limited as to time.

13 Subject to and without waiving any of the foregoing objections, Defendants are willing to  
14 meet and confer with Plaintiffs regarding the scope of this request, and to determine whether an  
15 agreement can be reached under which Defendants provide certain non-privileged documents  
16 responsive to this Request and proportional to the needs of this case, in a manner that does not  
17 subject Defendants to an undue burden.

18 **AMENDED RESPONSE TO DOCUMENT REQUEST NO. 16:**

19 Defendants amend and supplement their response as follows:

20 Pursuant to the foregoing objections, Defendants will not search for or produce any  
21 documents in response to this Request.

22 **DOCUMENT REQUEST NO. 17:**

23 All Documents that constitute, identify, describe, or discuss any analysis of the actual,  
24 estimated, or inferred ages of Your users in the United States, other than analysis of the age of an  
25 individual user, including all Documents concerning the actual, estimated, or inferred number or  
26 percentage of Your users in the United States who are or may be Children.

1 United States who are or may be minors, including the actual, estimated, or inferred number or  
2 percentage of YouTube users in the United States who are or may be minors, and will produce  
3 non-privileged responsive documents.

4 **DOCUMENT REQUEST NO. 18:**

5 All Documents that constitute, identify, describe, or discuss any analysis of the  
6 demographics of users of Your Platform, including the actual or estimated numbers of Children or  
7 Teens using Your Platform.

8 **RESPONSE TO DOCUMENT REQUEST NO. 18:**

9 Defendants object to this Request because it seeks information that is not relevant to the  
10 claims or defenses of any party. Defendants object to this Request to the extent it obligates them  
11 to produce “any” and “all” responsive documents, which is unduly burdensome, not proportional  
12 to the needs of this case, and not required under the Federal Rules. Defendants object to this  
13 Request as overly broad, unduly burdensome, and not proportional to the needs of the case to the  
14 extent it seeks documents or other materials related to features for which the Court has held claims  
15 are barred by the First Amendment or Section 230. Defendants object to this Request as overbroad,  
16 not proportional to the needs of the case, and not relevant to any viable claim or defense in that it  
17 seeks discovery concerning non-minor and non-adolescent platform users.

18 Defendants object to this Request to the extent it seeks information protected from  
19 disclosure by the attorney-client privilege, work-product doctrine, and/or any other applicable  
20 privilege or protection and will withhold or redact as appropriate such information to the extent it  
21 exists. Defendants object to this Request to the extent that it seeks materials relating to users  
22 located outside of the United States and/or features not available in the United States. Defendants  
23 object to this Request as unduly burdensome and not proportional to the needs of the case because  
24 the Request is not limited as to time.

25 Subject to and without waiving any of the foregoing objections, Defendants are willing to  
26 meet and confer with Plaintiffs regarding the scope of this request, and to determine whether an  
27 agreement can be reached under which Defendants provide certain non-privileged documents  
28

1 responsive to this Request and proportional to the needs of this case, in a manner that does not  
2 subject Defendants to an undue burden.

3 **AMENDED RESPONSE TO DOCUMENT REQUEST NO. 18:**

4 Defendants amend and supplement their response as follows:

5 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
6 reasonable search of the documents of agreed upon and Court-ordered custodians using the  
7 negotiated search terms for documents that constitute, identify, describe, or discuss analyses of  
8 aggregate metrics from the Relevant Time Period regarding the number of YouTube users in the  
9 United States who are minors, including metrics regarding the number of YouTube Kids Profiles  
10 or Supervised Experience accounts that use YouTube.

11 **DOCUMENT REQUEST NO. 19:**

12 All Documents that constitute, identify, describe, or discuss Your Policies regarding access  
13 to Your Platform by Children (“Child Access Policies”), including comments, edits, or suggested  
14 changes to such Policies.

15 **RESPONSE TO DOCUMENT REQUEST NO. 19:**

16 Defendants object to this Request to the extent it obligates them to produce “all” responsive  
17 documents, which is unduly burdensome, not proportional to the needs of this case, and not  
18 required under the Federal Rules. Defendants object to this Request as overly broad, unduly  
19 burdensome, and not proportional to the needs of the case to the extent it seeks documents or other  
20 materials related to features for which the Court has held claims are barred by the First Amendment  
21 or Section 230 and because, as drafted, the request is not tailored to Plaintiffs’ remaining  
22 allegations and the way the YouTube Platform allegedly contributes to the alleged harm.  
23 Defendants object to this Request as vague and ambiguous in its use of the “access” and “suggested  
24 changes”; these vague terms make it unclear what behavior it is that the request seeks information  
25 regarding.

26 Defendants object to this Request to the extent it seeks information protected from  
27 disclosure by the attorney-client privilege, work-product doctrine, and/or any other applicable  
28 privilege or protection and will withhold or redact as appropriate such information to the extent it

1 negotiated search terms for documents that constitute, identify, describe, or discuss YouTube's  
2 internal analyses regarding advertising revenue generated during the Relevant Time Period from  
3 advertising to United States users on YouTube Kids or by advertisers who advertise to United States  
4 users on both YouTube Kids and YouTube Main during the Relevant Time Period, and will produce  
5 non-privileged responsive documents.

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7  
8 Dated: July 3, 2024

Respectfully submitted,

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